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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

COREL SOFTWARE, LLC,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 2:15-cv-00528-JNP-PMW

**PLAINTIFF COREL SOFTWARE,
LLC’S MOTION FOR LEAVE TO
FILE UNDER SEAL PORTIONS OF
MEMORANDUM IN OPPOSITION TO
DEFENDANT’S MOTION TO STAY
LITIGATION PENDING *INTER
PARTES* REVIEW, AND EXHIBIT F
THERETO**

Plaintiff Corel Software, LLC requests leave from the Court to file under seal its
Memorandum in Opposition to Microsoft’s Motion to Stay and Exhibit F attached thereto.

Redacted versions of the Memorandum and the public Exhibits will be filed with the Court's CM/ECF system pursuant to Local Rule DUCivR 5-2(e).

This motion is made on the grounds that the redacted portions of the memorandum and all of Exhibit F contain, according to Microsoft, confidential and commercially sensitive information, including, confidential investigations and analyses performed by Microsoft's legal department, and/or depicts information contained in documents that are designated "Protected Information" or "Confidential—Attorneys Eyes Only" under the Protective Order in place in this litigation. Exhibit F contains excerpts from Jim Ross's deposition transcript dated April 22, 2016, which excerpts were designated as confidential.

Counsel for Corel certifies that the sealed memorandum and exhibits contain confidential information and is protectable under the Court's Standard Protective Order. The sealed filing has been narrowly tailored to protect only that information deserving of protection. Corel has complied with Local Rule DUCivR 5-2(e) and has only designated specific material as privileged. Corel therefore requests that the Court grant it leave to file the Memorandum and Exhibit F under seal.

DATED: June 13, 2016

PARR BROWN GEE & LOVELESS

/s/ Chad S. Pehrson

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SERVICE

I, Andrea Foutz, hereby certify that on June 13, 2016, I served a copy of the foregoing document upon the following counsel of record for Microsoft Corporation, via email:

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By: /s/ Andrea Foutz